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MANUFACTURING COMPANY  
5411 Bulwer, St. Louis, Missouri 63147  
(314) 381-2200

February 22, 1982

Ms. Cheryle Micinski  
Attorney  
Legal Enforcement Staff  
Office of Regional Counsel  
U.S. EPA Region VII  
324 East 11th Street  
Kansas City, Missouri 64106

Re: In the Matter of  
Perfection Manufacturing Company  
Docket Number 81-H-021



R00406933

Dear Ms. Micinski:

RCRA RECORDS CENTER

This will confirm your telephone conversation of February 17, 1982 with Robert Carr concerning the Complaint issued against Perfection Manufacturing.

Paint Sludge

The nine (9) drums of waste paint sludge which were located at the plant on August 13, 1981, were generated during June and July in connection with the spraying of lead-free paint. This waste has recently been tested and found to contain neither lead, nor a substantial quantity of any other metal included in the E.P. Toxicity standard. A copy of the test results is enclosed for your information. Contrary to the statement in the Complaint, this material was shipped off-site on a regular schedule within ninety (90) days of being removed from the paint line.

The paint waste referred to in my letter of March 24, 1981, which was on-site when the facility was acquired, had been accumulated over a period when paint containing lead was being used. All such material was shipped off-site on April 20, 1981, as indicated in my previous correspondence.

Unmarked Drums

The inspector refers to additional drums which were not labeled. I believe that these drums consisted of the following:

4 drums of Waste Xylene generated prior to 11/19/80.

1 drum of Waste Xylene generated by current operations,  
i.e., from 12/80 to 8/81.

cont'd. . . . .

THE PERFECTION MANUFACTURING COMPANY

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Ms. Cheryle Micinski, Attorney  
Legal Enforcement Staff  
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324 East 11th St.  
Kansas City, MO. 64106

4 partial drums of Sludge from caustic cleaner generated  
prior to 11/19/80.

All of the Xylene has been shipped off-site. It was being held while we sought an economical means of recycling or disposal, and was sent to an incinerator located in Sauget, Illinois on August 27, 1981, along with a sixth drum which was accumulated between August 1st and August 27th. The Incinerator is operated by T.W.I., Inc.

Since August 27th, waste Xylene has been generated at the average rate of 40 to 50 gallons per month, depending on our production level. It is shipped off-site before 1000 kgs. are accumulated.

Final test results for the caustic sludge are forthcoming and will determine,

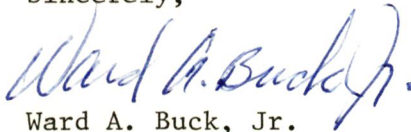
- (a) whether the sludge is subject to regulation, and,
- (b) whether a local disposal facility is capable of handling same.

The non-hazardous nature of the paint sludge currently being generated enables Perfection to qualify as a Small Generator under 40 CFR 261.5. Therefore, the requirements referred to in the Complaint and letter do not apply.

While not compelled to do so, we have, since September, stored drums of ignitable waste away from the property line; labeled and marked all waste drums; consolidated the four (4) partial drums of caustic waste into two (2) new drums; and established a program of regular weekly inspections.

Please refer any questions which may arise to Mr. Carr at (212) 732-8554.

Sincerely,



Ward A. Buck, Jr.  
Vice-President, Mfg.

jg

cc: R. Carr  
S. Wilner